

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

FRANK THOMAS, an individual)	
)	
Plaintiff,)	
)	Case No. 14-cv-1937
v.)	
)	Honorable Matthew F. Kennelly
REEBOK INTERNATIONAL LTD.,)	
a Massachusetts corporation,)	Magistrate Judge Cole
)	
Defendant.)	

STIPULATION TO EXTEND CLOSE OF FACT AND EXPERT DISCOVERY PERIODS

Plaintiff Frank Thomas (“Thomas”), and Defendant Reebok International Ltd. (“Reebok”), by their respective counsel, hereby stipulate and agree to the following extension of time, subject to the Court’s approval:

1. At the Case Management Conference on May 27, 2014, the Court entered a Case Management Order requiring that all fact discovery be completed by November 17, 2014.

2. Since that time, the parties have exchanged written discovery and participated in multiple meet-and-confer conferences to independently resolve discovery disputes.

Additionally, Plaintiff has taken the depositions of four Reebok witnesses. However, due to Thomas’s engagement as a television commentator for Major League Baseball’s playoff games, which potentially run through October 29, 2014, the parties have had difficulty scheduling Thomas’s deposition.

3. Nevertheless, in an effort to resolve this matter, the parties have agreed to privately mediate the case the week of November 20, 2014.

4. In the event that the parties are unable to resolve this matter at mediation, the parties have agreed to proceed with Thomas's deposition on December 9, 2014. The parties also expect to proceed with the remaining third-party depositions shortly thereafter.

5. In light of the above, the parties hereby stipulate, subject to the Court's approval, to the following ninety (90) day extension of the fact and expert discovery schedules:

- a. All fact discovery shall be completed on or before **February 16, 2015**.
- b. Rule 26(a)(2) disclosures shall be made on or before **March 6, 2015**.
- c. Rebuttal disclosures shall be made on or before **April 10, 2015**.
- d. All expert discovery shall be completed on or before **May 1, 2015**.

6. There have been no previous extensions of the discovery period. This stipulation is made in good faith and not for the purpose of delay. Neither party will suffer any harm or prejudice upon the approval of this stipulation.

Dated: October 13, 2014

Respectfully submitted,

REEBOK INTERNATIONAL, LTD.

FRANK THOMAS

By: /s/ James T. Hultquist
James T. Hultquist
Joshua W. Newman
REED SMITH LLP
10 South Wacker Drive, 40th Floor
Chicago, IL 60606
Tel: (312) 207-1000
Fax: (312) 207-6400

By: /s/ Ralph C. Loeb
Ralph C. Loeb
Jeremy D. Smith
KRANE & SMITH APC
16255 Ventura Boulevard, Suite 600
Encino, CA 91436-2302
Tel: (818) 382-4000
Fax: (818) 382-4001

Counsel for Defendant Reebok International Ltd.

Steven J. Thompson
Alexandros Stamatoglou
UNGARETTI & HARRIS LLP
3500 Three First National Plaza
Chicago, Illinois 60602
(312) 977-4400
(312) 977-4405 – facsimile

Counsel for Plaintiff Frank Thomas

CERTIFICATE OF SERVICE

I hereby certify that on the 13th day of October, 2014, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF registrants:

Steven J. Thompson (IL Bar No. 61 96230/Federal Trial Bar Member)
Alexandros Stamatoglou (IL Bar No. 6308169)
UNGARETTI & HARRIS LLP
3500 Three First National Plaza
Chicago, Illinois 60602
(312) 977-4400
(312) 977-4405 - facsimile

Ralph C. Loeb (Pro Hac Vice Appearance Pending)
Jeremy D. Smith (Pro Hac Vice Appearance Pending)
KRANE & SMITH, APC
16255 Ventura Boulevard, Suite 600
Encino, California 9 1436-2302
(818) 382-4000
(818) 382-4001 -- facsimile

/s/ Joshua W. Newman
James T. Hultquist
Joshua W. Newman
REED SMITH LLP
10 South Wacker Drive, 40th Floor
Chicago, IL 60606-7507
Tel: (312) 207-1000
Fax: (312) 207-6400
jhultquist@reedsmith.com

Attorneys for Defendant Reebok International Ltd.